

However, it is respectfully submitted that polyether sulphone and diaryl terelathalate do not react with each other, and that each compound independently forms a different polymer. Therefore, in Touto, there is no disclosure of a material which has both a polymerizable group and a functional group from which a polymer is formed.

It is, therefore, respectfully submitted that **claim 1 and dependent claims 2, 5, 6, 10, and 26** are patentable over Touto.

Independent **claims 3 and 20** recite features similar to those recited in claim 1 and, therefore, are patentable at least for the reasons similar to those discussed above regarding claim 1. Dependent **claims 4, 21, 22, 27, 28, and 30** are patentable at least by virtue of their respective dependencies.

Additionally, regarding **claim 3**, after the polymer layer is formed by using the claimed specific compound, patternwise application of heat, acid, or radiation is carried out in order to change the structure of the functional groups existing at the applied portion.

Therefore, the functional group existing at the applied portion changes its structure of interaction with the electroless plating catalyst or precursor thereof, or, the functional group loses its interaction capability with the electroless plating catalyst or precursor thereof. The changed structure of the functional group results in a changed interaction capability with the electroless plating catalyst or precursor thereof or in loss of an interaction capability with the electroless plating catalyst or precursor thereof. Touto does not disclose or suggest such a functional group or this mechanism.

It is, therefore, respectfully submitted that **claim 3** is patentable at least for these additional reasons.

Regarding **claims 2, 4 and 6**, Touto does not disclose or suggest the process in which a specific polymerization initiating layer is formed as an independent layer prior to forming a polymer layer.

It is, therefore, respectfully submitted that **claims 2, 4, and 6** are patentable at least for this additional reason.

Regarding **claims 26-27 and 30**, the Examiner states that a carboxyl group is included in the ethylaminoethyl benzoic acid disclosed in Touto. However, ethylaminoethyl benzoic acid in Touto is an optical start auxiliary agent, and is not a compound which has both of a "polymerizable group" and a "specific functional group." That is, a compound such as ethylaminoethyl benzoic acid cannot generate a polymer as the claimed specific compound.

It is, therefore, respectfully submitted that **claims 26-27 and 30** are patentable at least for these additional reasons.

**VI. Claim Rejections - 35 U.S.C. § 103**

**A. Claims 7 and 8** are rejected under 35 U.S.C. 103(a) as being unpatentable over Touto in view of Barclay.

Claims 7 and 8 depend on independent claim 1. As discussed above, Touto do not teach all of the features of claim 1. Barclay does not cure any above-discussed deficiency of this reference. It is, therefore, respectfully submitted that claims 7 and 8 are patentable at least by virtue of their dependencies.

Further, Applicants respectfully submit that Touto does not disclose or suggest the processes (I-3-1) and (I-3-2), as recited in claim 7. In particular, a polymer layer in a pattern form is made by ablation by irradiating the polymer layer with radiation. Ablation relates to directly removing a polymer layer patternwise by applying radiation, and is not removing or dissolving an irradiated portion by development.

Further, the Examiner cites Barclay and indicates that a photo resist includes novolak resin and a UV absorbing dye. However, the light to heat conversion agent used in claim 7 absorbs light having a maximum wavelength of 760 to 1200 nm, which means that the light to heat conversion agent absorbs infrared light but does not absorb UV light. That is, the photo resist disclosed in Barclay cannot form the photosensitive layer of claim 7.

It is, therefore, respectfully submitted that **claims 7 and 8** are patentable at least for these additional reasons.

**B. Claims 1, 9, 11, 12, 20, 23, 29, and 31** are rejected under 35 U.S.C. 103(a) as being unpatentable over Wakizawa in view of Touto.

As discussed above, Touto does not teach or suggest all of the features of independent claim 1 or 20. Wakizawa does not cure any above-discussed deficiency of Touto. Therefore, even by combining the disclosures of Touto and Wakizawa, the subject matter of claim 1 or 20 will not be achieved.

Accordingly, **claims 1 and 20** are patentable over Wakizawa and Touto, taken singularly or in combination. **Dependent claims 9, 11, 12, 23, 29, and 31** are patentable at least by virtue of their respective dependencies.

### **CONCLUSION**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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